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OCT 23 2000

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OFFICE OF THE SECRETARY

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(1956-1983)
PAUL D. P. SPEARMAN
(1936-1962)
FRANK ROBERSON
(1936-1961)
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October 23, 2000

BY HAND

Magalie Roman Salas, Esquire
Secretary
Federal Communications Commission
445 12th Street, S.W., Room TW-B204
Washington, DC 20554

Re: Petition for Rulemaking
Willow Creek, California

Dear Ms. Salas:

Enclosed herewith, on behalf of Four Rivers Broadcasting, Inc., are an original and four copies of its Petition for Rulemaking, requesting the Commission to amend the FM Table of Allotments to allot Channel 254A to Willow Creek, California, as that community's first local aural transmission service.

Should there be any questions regarding this matter, kindly communicate directly with the undersigned.

Very truly yours,
FLETCHER, HEALD & HILDRETH, P.L.C.


Alison J. Shapiro
Counsel for Four Rivers Broadcasting, Inc.

Enclosure

cc: Mr. John A. Karousos, FCC (w/encl.)

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**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

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In the Matter of)
Amendment of Section 73.202(b))
Table of Allotments,)
FM Broadcast Stations.)
(Willow Creek, California))

MM Docket No. _____

RM No. _____

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

To: Chief, Allocations Branch

PETITION FOR RULEMAKING

Four Rivers Broadcasting, Inc. ("Four Rivers"), by counsel, and pursuant to Section 1.401 of the Commission's rules, hereby respectfully requests that the Commission institute a rulemaking proceeding for the purpose of amending the FM Table of Allotments to add Channel 254A to Willow Creek, California, as that community's first local aural transmission service. Thus, Four Rivers proposes to amend Section 73.202(b) of the Commission's rules as follows:

Channel No.

<u>City</u>	<u>Present</u>	<u>Proposed</u>
Willow Creek, California	-----	254A

In support of this request, the following is stated:

Willow Creek, California, which is a Census Designated Place ("CDP"), had a 1990 U.S. Census population of 1,576.¹ Willow Creek, located on the borders of the Humboldt and Trinity Counties, is a rugged mountain community nestled in the heart of the Six Rivers National Forest.

¹ Source: *Rand McNally Commercial Atlas & Marketing Guide* (130th ed.) (1999).

Willow Creek is situated on the Trinity River and renown for its salmon and steelhead fishing.

Willow Creek has its own chamber of commerce, volunteer fire department, and post office. The Willow Creek Chamber of Commerce lists over 50 business organizations within the community. See Exhibit 1. These include two banks, three grocery stores, eight car repair garages, five restaurants, nine hotels/motel/inns, two realty companies, a golf course, two fishing supply stores, two white water rafting stores, two hardware stores, one arcade, three contractors, one pharmacy, three construction companies, and one trucking company. The community also has six churches, one outpatient clinic, a rehabilitation and sports center, a family health center, an ambulance service, a dental clinic, a family medical center, a museum, a theater, and a hair salon. Some of these businesses have explicit association by name with Willow Creek, including, for example, Willow Creek Chevron Station, Willow Creek Parts, Willow Creek Six Rivers Medical, Willow Creek Dental Clinic, Willow Creek Pharmacy, Willow Creek Video & Arcade and Willow Creek/China Flat Museum. It is only a short drive from California's Redwood Forest and beautiful north coast beaches.

There are two schools in the Willow Creek School District -- Trinity Valley Elementary School (K through 8) and Willow Creek Christian School (K through 12). These schools provide a full instructional program for children in grades Kindergarden through 12 and are fully accredited by the State of California Department of Education.

Located in between the Trinity and Klamath Rivers, Willow Creek's spectacular beauty has been a magnet for recreationists for many years. In recent years there has been great interest in whitewater sports including rafting, kayaking, canoeing, as well as swimming and tubing. Many trails and back roads are available for hikers, bird watchers and hunters. Another

attraction of Willow Creek is the renown Willow Creek/China Flat Museum, referenced above, which contains mining, logging, and Native American exhibits.

As demonstrated in the attached Engineering Statement, the reference coordinates for the proposed channel at Willow Creek meet the minimum distance separation requirements with respect to all known licenses, construction permits, pending applications, and pending rulemaking proceedings. The Willow Creek allotment reference site complies with the minimum spacing requirements contained in Section 73.207 of the Commission's rules.

As stated above, the addition of Channel 254A will provide Willow Creek with its first local aural transmission service. Currently, there are no other commercial or noncommercial stations licensed to Willow Creek. Thus, the addition of this allotment at Willow Creek will promote the objectives of Section 307(b) of the Communications Act by seeking to achieve a fair, efficient and equitable distribution of broadcast stations among the various states and communities. 47 U.S.C. § 307(b).

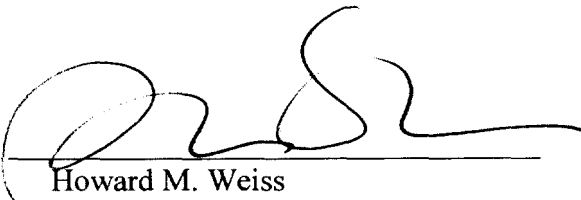
The FM Table of Allotments was created to allow the Commission to meet its obligation under Section 307(b) and the allotment priorities developed in *Revision of FM Assignment Policies and Procedures*, 90 FCC 2d 88, 91 (1982). These were intended to promote the statutory goals underlying Section 307(b). The main objective of the 1982 revision was to provide service of satisfactory signal strength to the whole country, while providing as many program choices to as many listeners as possible and providing service of local origin to as many communities as possible. To these ends, the Commission set forth the following as priorities: (1) first full-time aural service; (2) second full-time aural service; (3) first local service and; (4) other public interest matters (priorities 2 and 3 were given co-equal weight). Thus, the allotment of a

first full-time local aural transmission service to Willow Creek would satisfy the core objectives of Section 307(b), and also meets the Commission's third allotment priority.

In the event that this petition requesting the allotment of Channel 254A at Willow Creek, California is granted, Four Rivers will file an application for a construction permit for the new station, and, if its application is granted, will promptly construct the new facility.

WHEREFORE, in light of the foregoing, Four Rivers Broadcasting, Inc., respectfully requests that the Commission GRANT this petition for rulemaking, AMEND the FM Table of Allotment, and ALLOT Channel 254A to Willow Creek, California, as that community's first full-time local aural transmission service.

Respectfully submitted,
FOUR RIVERS BROADCASTING, INC.

By: 
Howard M. Weiss
Alison J. Shapiro

Its Counsel

Fletcher, Heald & Hildreth, P.L.C.
1300 North 17th Street, 11th Floor
Arlington, Virginia 22209
(703)812-0400

October 23, 2000

EXHIBIT 1
WILLOW CREEK, CALIFORNIA BUSINESSES

Restaurants

Cinnabar Sams

Steve and Paula Paine
Willow Creek, Ca 95573
530-629-3437

Pizza Factory

Po Box 999-39032 Hwy 299
Willow Creek, Ca 95573
530-629-4800

Raging Creek Pub & Eatery

John Miller
PO Box 1597
Willow Creek, Ca 95573

Bigfoot Golf & Country Club

Carol Tonkin
PO Box 836
Willow Creek, Ca 95573

Marcy's

Marcy Parks
HCR 34
Burnt Ranch, Ca 95527

Early Bird

PO Box 959
Willow Creek, Ca 95573
530-629-4431

Home

Accommodations In Town

Bigfoot Motel
Joe & Mary Daher
39039 Hwy 299
Willow Creek, Ca 95573
530-629-2142
[visit our website \(click here\)](#)

Willow Creek Motel
Bob & Linda Flint
Hwy 96 PO Box 508
Willow Creek, Ca 95573
(530)629-2115
[visit our website \(click here\)](#)

Gambi Hill Motel & RV Park
Ruth Smith
PO Box 1487
Willow Creek, Ca 95573
530-629-2701

Annies Cottage
PO Box 359
Willow Creek, Ca 95573
530-629-3324

Heron Bar Cabin
Rusty & Jan Hagen
PO Box 131
Willow Creek, Ca 95573
530-629-2473

Peach Tree Inn
Les & Dieane Christian
PO Box 926
Willow Creek, Ca 95573
530-629-2969

The River Place
PO Box 1170
Willow Creek, Ca 95573
530-629-0010

Trinity River Cabin

Sheri Wild
PO Box 583
Hoopa, Ca 95546
530-629-4245
email sheri_sheri_marie@hotmail.com
we are located 4.5 miles from Willow Creek
on Seely McIntosh Road

RV Parks

Gambi Hill Motel & RV Park

Ruth Smith
PO Box 1487
Willow Creek, Ca 95573
530-629-2701

Knight's Park

Bob & Noel Knight
3353 Hwy 96
Willow Creek, Ca 95573
530-629-3219

Trinity River Trailer Park

PO Box 5
Hoopa, Ca 95546
530-625-4536

Klamath Riverside Park

PO Box 236
Orleans, Ca 95556
phone 1-800-627-9779,
e-mail klamathrv@aol.com,

Del Loma RV Park

Rt 1 Box 54
Big Bar, Ca 96010
530-623-2834

Accommodations Nearby

Klamath River Lodge

Gretha McMurray
2039 Williams St
Eureka, Ca 95501
707-443-7021

Rainbow Lake/El Grove Acres

Eleanor Jones
PO Box 98
Burnt Ranch, Ca 95527
530-629-3914
[visit our website \(click here\)](#)

Trinity Canyon Lodge

John & Jeremy Drakeford
PO Box 2820
Helena, Ca 96048
800-345-9297

Tsewenaldin Inn

PO Box 219
Hoopa, Ca 95556
530-625-4294



**Early Bird
PO Box 959
Willow Creek, Ca 95573
530-629-4431**

**Bob's Shopping Center
PO Box 1048
Willow Creek, Ca 95573
530-629-2457**

**Union 76 Gas & Mini Mart
PO Box 683
Willow Creek, Ca 95573
530-629-3241**

**Willow Creek Chevron Station
PO Box 1149
Willow Creek, Ca 95573
530-629-3546**

**Rays Food Place
PO Box 278
Hoopa, Ca 95546
530-625-4111**

**Pearson's Grocery
Site 10 Box 3
Hoopa, Ca 95546**

[Home](#)

Frances Janney
Ming Tree -Willow Creek Real Estate
PO Box 1527
Willow Creek, Ca 95573
Bus-(530)629-3177

Greg Chisholm
Humboldt Land Company
PO Box 1598
Willow Creek, Ca 95573
(530)629-3030



**Coast Central Credit Union
PO Box 956
Willow Creek, Ca 95573
530-629-3128**

**Humboldt Bank
PO Box 315
Willow Creek, Ca 95573
530-629-2125**


**The Mill Yard
PO Box 4479
Arcata, Ca 95518
707-822-9860**

**Jury's Ace Hardware
PO Box 39
Hoopa, Ca 95518
530-625-4287**

**Robert's Mercantile
PO Box 954
Willow Creek, Ca 95573-0954
530-629-2134**

**Bigfoot Tru Value Hardware
PO Box 1558
Willow Creek, Ca 95573

530-629-2302**

 [Home](#)



**Willow Creek Parts
Napa
POBox 247
Willow Creek, Ca 95573
530-629-2121**

**Frank's Garage
PO Box 1559
Willow Creek, Ca 95573
530-629-2709**

**Union 76 Gas & Mini Mart
PO Box 683
Willow Creek, Ca 95573
530-629-3241**

**Northcoast Auto
PO box 4946
Eureka, Ca
707-442-3781**

**Buddy's Auto Repair
PO Box 95
Willow Creek, Ca 95573
530-629-2424**

**Willow Creek Chevron Station
PO Box 1149
Willow Creek, Ca 95573**

530-629-3546

W.C. Towing and Auto Repair
PO Box 1165
Willow Creek, Ca 95573
530-629-3499

Gary's Auto Repair
PO Box 278
Willow Creek, Ca
530-629-3210

L&M Renner Petroleum
PO Box 4868
Eureka, Ca 95502
707-443-1645

Robert's Mercantile
PO Box 954
Willow Creek, Ca 95573-0954
530-629-2134



Medical Services


Willow Creek Six Rivers Medical
PO Box 1045
Willow Creek, Ca 95573-1045

Willow Creek Dental Clinic
PO Box 1125
Willow Creek, Ca 95573
530-629-2155

St Joseph Health System
2700 Dolbeer St
Eureka, Ca 95501
707-269-4264

Mad River Community Hospital
PO Box 1115
Arcata, Ca 95521

707-822-8200

 ***Home***



Parish Signs
PO Box 122
Burnt Ranch, Ca 95527
530-629-2614

Bill "Burro" Lewinson
PO Box 270
Willow Creek, Ca 95573
530-629-3927

Trish Oakes Photography
PO Box 327
Salyer, Ca 95563
530-629-2901

Home

***Willow Creek Video & Arcade
Julie Bradley
PO Box 757
Willow Creek, Ca 95573-0759***

530-629-3123

Cam Appleton
Brizard Company
791 8th St
Arcata, Ca 95521

Robin Arkley
980 14th St
Arcata, Ca 95521
635-4337



Ralph & Denise Canfield
Otis Walton Properties
2548 Maple Lane
Arcata, Ca 95521

**Campora
PO Box 627
Willow Creek, Ca 95573
560-629-3812**

**Amerigas
PO Box 1569
Willow Creek, Ca 95573
530-629-4292**


Nurseries - Farms

Trinity River Farm

 Willow Creek, Ca 95573 
530-629-3200

Robert's Mercantile
PO Box 954
Willow Creek, Ca 95573
530-629-2134

Sun Valley Floral Farm


3160 Upper Bay Rd. 
Arcata, Ca 95521
707-826-7549

Miller Farms Nursery
PO Box 2145
McKinleyville, Ca 95519
707-839-1571



Bigfoot Tru Value Hardware
PO Box 1558
Willow Creek, Ca 95573
530-629-2302



 Home

FISHING

Bigfoot Rafting Co.
Marc & Londa Rowley
PO Box 729
Willow Creek, Ca 95573
1-800-722-2223

"D" Fishing Guide
Fishing Report
E.B. Duggan
PO Box 867
Willow Creek, Ca 95573
530-629-3554

GOLF COURSES

Bigfoot Golf & Country Club
Carol Tonkin
PO Box 836
Willow Creek, Ca 95573
530-629-4658

WHITEWATER RAFTING

Bigfoot Rafting Co.
Marc & Londa Rowley
PO Box 729
Willow Creek, Ca 95573
1-800-722-2223

Aurora River Adventures
Jamie O'Donnell
email us!
PO Box 938
Willow Creek, Ca 95573
1-800-562-8475

Klamath River Outfitters
Wally & Edna Watson
3 Sandy Bar Road
Somes Bar, Ca 95568
1-800-748-3735

Trinity River Rafting
David & Dana Steinhauser
PO BOX 572
Big Bar, Ca 96010
1-800-307-4837



Whitson's Inc
PO Box 240
Willow Creek, Ca 95573
530-629-2324

KJ Construction
PO Box 1557
Willow Creek, Ca 95573
530-629-4445

Steve Nies, Mason
PO Box 523
Salyer, CA 95563
530-629-3679

[Home](#)

Gifts

Willow Creek Pharmacy
PO Box 67
Willow Creek, Ca 95573-0067
530-629-3144

Bigfoot Tru Value Hardware
PO Box 1558
Willow Creek, Ca 95573
530-629-2302

Willow Bay Candles
PO Box 610
Willow Creek, CA 95573
530-629-3836

Roberts Mercantile
PO Box 954
Willow Creek, Ca 95573
530-629-2134

Soroptomists Int. of Bigfoot Country
PO Box 412
Willow Creek, Ca 95573

Kiwanis Club
Po Box
Willow Creek, Ca 95573
(530)629-

Lions
PO Box
Willow Creek,Ca
(530)629-

*Mercer Fraser Company
PO Box 1006
Eureka, Ca 95502
707-442-6371*

*Tonkin Construction
PO Box 449
Willow Creek, Ca 95573
530-629-2365*

*Bill Gower Trucking
PO Box 606
Willow Creek, Ca 95573
530-629-2608*

*McKnight Construction
PO Box 38
Salyer, Ca 95563
530-629-2070*

*Louis Walton Backhoe
PO Box 953
Willow Creek, Ca 95573
530-629-2074*

*R. Brown Construction Co.
PO Box 406
Willow Creek, Ca 95573
530-629-3702*



GRAHAM BROCK, INC.

BROADCAST TECHNICAL CONSULTANTS

PETITION FOR RULE MAKING
FOUR RIVERS BROADCASTING, INC.
ALLOT CHANNEL 254A
WILLOW CREEK, CALIFORNIA
October 2000

TECHNICAL EXHIBIT

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PETITION FOR RULE MAKING
FOUR RIVERS BROADCASTING, INC.
ALLOT CHANNEL 254A
WILLOW CREEK, CALIFORNIA
October 2000

TECHNICAL STATEMENT

1. This technical statement and attached exhibits were prepared on behalf of Four Rivers Broadcasting, Inc. ("FRB"). FRB herein requests the allotment of Channel 254A to Willow Creek, California. The allotment will provide Willow Creek with its first local transmission service.

Discussion

2. FRB requests the Commission amend §73.202 of its rules by allocating Channel 254A to Willow Creek, California. The community of Willow Creek is located in the extreme eastern portion of Humboldt County, California. Willow Creek is listed in the 1990 U.S. Census as a Census Designated Place with a population of 1,576 persons. Willow Creek also has numerous businesses and churches. Willow Creek is not located near any Urbanized Area, as defined in the 1990 Census.

Request

3. Channel 254A can be allotted to Willow Creek, California, with a site restriction of 2.7 kilometers east of the community to avoid shortspacing KAJK-FM, Channel 256C1, Ferndale, California, at reference coordinates North Latitude 40° 55' 30" and West Longitude 123° 35' 35". As shown on Exhibit #1, Channel 254A meets the Commission's minimum distance separation requirements to all licensed, applied for or proposed facilities. Exhibit #2

is a usable area map denoting the area in which to locate a transmitter site for Channel 254A at Willow Creek. From the proposed reference site, a 3.15 mV/m contour will be delivered to Willow Creek.

4. Therefore, FRB requests the following amendment to §73.202 of the Commission's rules:

Willow Creek. California

Present
None

Proposed
254A

5. The allotment of Channel 254A to Willow Creek will provide first local service to the community. A maximum Class A operating from the proposed reference site will deliver 60 dBu service to 5,246 persons in 2,516.1 square kilometers.¹ When Channel 254A is allotted to Willow Creek, FRB will submit to the FCC the necessary application or form stating its intention to construct a new FM station on Channel 254A at Willow Creek.

6. The foregoing technical statement was prepared on behalf of Four Rivers Broadcasting, Inc., by Graham Brock, Inc., its Technical Consultants. All of the information contained herein is true and accurate to the best of our belief and knowledge. All data related to FM facilities was extracted from the CDBS database. We assume no liability for errors or omissions in the database which may adversely affect the requests contained herein.

1) Based on a maximum non-directional Class A service radius of 28.3 kilometers.

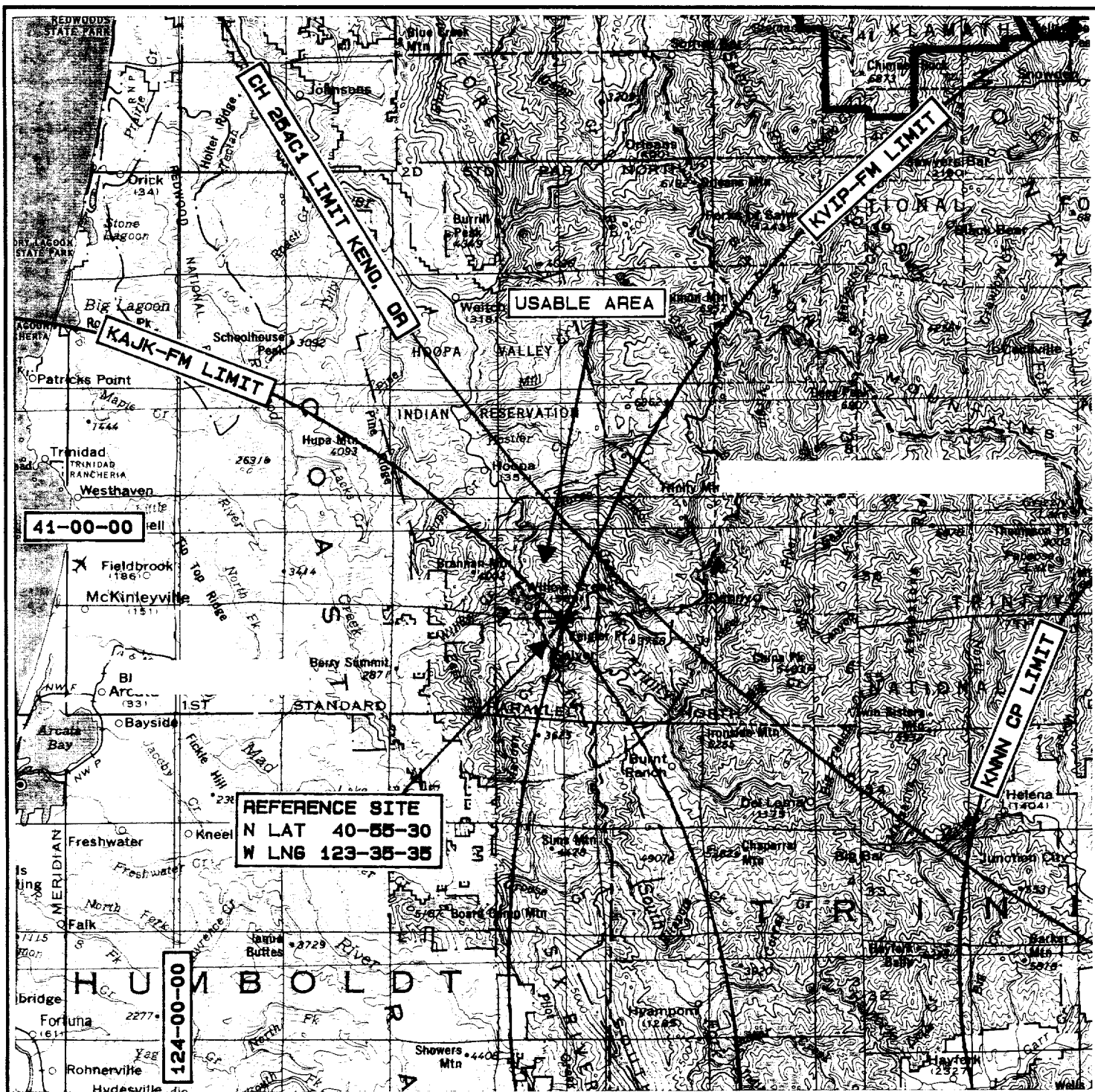
PETITION FOR RULE MAKING
FOUR RIVERS BROADCASTING, INC.
ALLOT CHANNEL 254A
WILLOW CREEK, CALIFORNIA
October 2000

EXHIBIT #1

ALLOCATION STUDY FOR WILLOW CREEK, CALIFORNIA
 USING PROPOSED ALLOCATION SITE AS REFERENCE

REFERENCE		DISPLAY DATES
40 55 30 N	CLASS A	DATA 10-13-00
123 35 35 W	Current rules spacings	SEARCH 10-19-00
----- CHANNEL 254 - 98.7 MHz -----		

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
AD254	254A	Willow Creek	OR	0.0	0.00	115.0	-115.00
AD	40 55 30	123 35 35	0.000 kW	0M	0.0	71.5	
Four Rivers Broadcasting, Inc.							
KAJKFM	256C1	Ferndale	CA	231.3	75.12	75.0	0.12
LIC CN	40 30 03	124 17 08	6.000 kW	523M	46.7	46.6	
Miller Broadcasting Company BLH-19961202KB							
KVIPFM	251C	Redding	CA	108.1	95.20	95.0	0.20
LIC CN	40 39 18	122 31 21	30.000 kW	521M	59.2	59.0	
Pacific Cascade Communication BMLD-19971006KC							
950206	254C1	Keno	OR	45.1	206.67	200.0	6.67
APP CX	42 13 23	121 49 03	52.000 kW	212M	128.4	124.3	
Fatima Response, Inc. BPED-19950206MH							
950206	254C1	Keno	OR	45.1	206.67	200.0	6.67
APP CX	42 13 23	121 49 03	52.000 kW	212M	128.4	124.3	
Renaissance Community Improv. BPED-19950206MB							
KNNN.C	257C2	Shasta Lake City	CA	108.1	95.43	55.0	40.43
CP CN	40 39 15	122 31 12	1.600 kW	465M	59.3	34.2	
Regent Licensee Of Redding, Inc. BPH-19990325IC							
KBNF.C	255C	Chester	CA	108.6	231.03	165.0	66.03
CP CN	40 14 00	121 01 11	25.000 kW	751M	143.6	102.6	
Carousel Broadcasting BPH-19960709ID							
KBNF	255C	Chester	CA	108.6	231.03	165.0	66.03
LIC CN	40 14 00	121 01 11	25.000 kW	737M	143.6	102.6	
Carousel Broadcasting BLH-19890427KB							
KSAY	253B1	Fort Bragg	CA	186.2	166.36	96.0	70.36
AUX H	39 26 08	123 48 15	0.950 kW	0M	103.4	59.7	
Axell Broadcasting BXLH-19991217ACM							
KNNN	257A	Shasta Lake City	CA	112.4	104.44	31.0	73.44
LIC CN	40 33 46	122 27 07	5.300 kW	100M	64.9	19.3	
Regent Licensee Of Redding, Inc. BMLH-19891211LI							
KNSQ	201C2	Mount Shasta	CA	72.6	113.79	15.0	98.79
LIC CN	41 13 22	122 17 51	5.000 kW	271M	70.7	9.3	
State Of Ore./state Bd. Of Hg BLED-19940505KC							



USABLE AREA MAP

MAP IS A PORTION OF THE 1: 500, 000 SCALE
U.S.G.S. BASE STATE MAP OF CALIFORNIA
(NORTH HALF) .

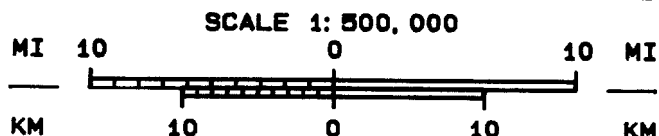


EXHIBIT #2

USABLE AREA STUDY
FOUR RIVERS
BROADCASTING, INC.
ALLOT CHANNEL 254A
WILLOW CREEK, CALIFORNIA
October 2000

GRAHAM BROCK, INC.

BROADCAST TECHNICAL CONSULTANTS

AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT

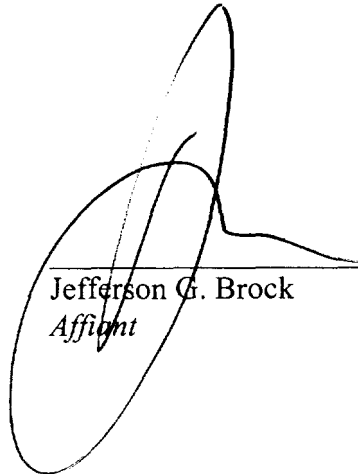
State of Georgia)
St. Simons Island) ss:
County of Glynn)

JEFFERSON G. BROCK, being duly sworn, deposes and says that he is an officer of Graham Brock, Inc. Graham Brock has been engaged by Four Rivers Broadcasting, Inc., to prepare the attached Technical Exhibit.

His qualifications are a matter of record before the Federal Communications Commission. He has been active in Broadcast Engineering since 1979.


The attached report was either prepared by him or under his direction and all material and exhibits attached hereto are believed to be true and correct.

This the 19th day of October, 2000.



Jefferson G. Brock
Affiant

*Sworn to and subscribed before me
this the 19th day of October, 2000.*



Notary Public, State of Georgia
My Commission Expires: April 20, 2002